

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OKLAHOMA**

In Re:	)	
	)	
HAILEY RENEE JONES	)	
	)	
	)	
	)	Case No. 19-10109-R
Debtor.	)	(Chapter 13)

**TRUSTEE’S OBJECTION TO CONFIRMATION OF PLAN**

COMES NOW Lonnie D. Eck, Standing Chapter 13 Trustee for the Northern District of Oklahoma, and for his objection to confirmation of the proposed plan, states:

1. The Debtor filed a Chapter 13 Plan on January 23, 2019 [Doc. No. 6] (the “Plan”).

2. Part 3, Section 3.1 of the Plan provides for the maintenance of ongoing monthly mortgage payments and payment of pre-petition mortgage arrearages on the mortgage held by Wells Fargo, secured by the Debtor’s principal residence. The Trustee notes the creditor has not yet filed a mortgage proof of claim, and the deadline for the filing of nongovernmental claims is April 3, 2019.

3. The Plan does not address the secured claim of the U.S. Department of Housing and Urban Development (Claim No. 1).

WHEREFORE, the Standing Chapter 13 Trustee prays that the Court deny confirmation of the Plan.

s/ Michael J. George  
Lonnie D. Eck, Standing Chapter 13 Trustee  
Michael J. George, OBA #22570  
Office of the Standing Chapter 13 Trustee  
Northern District of Oklahoma  
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**CERTIFICATE OF MAILING**

I, Michael J. George, hereby certify that on the date the above and foregoing pleading was filed with the Court, in addition to those served electronically through the Court's CM/ECF system, a true and correct copy thereof was mailed, by first-class mail, postage prepaid to each of the following:

Hailey Renee Jones  
111 South Choctaw Avenue  
Dewey, OK 74029-3003

s/ Michael J. George  
Michael J. George, OBA #22570